IN THE SUPREME COURT OF THE UNITED STATES

No. 23-207

R.J. REYNOLDS TOBACCO COMPANY; R.J. REYNOLDS VAPOR COMPANY; AMERICAN SNUFF COMPANY LLC; SANTA FE NATURAL TOBACCO COMPANY, INC.; MODORAL BRANDS INC.; NEIGHBORHOOD MARKET ASSOCIATION, INC.; AND MORIJA, LLC DBA VAPIN' THE 619,

Petitioners,

ROBERT BONTA, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL OF CALIFORNIA; AND SUMMER STEPHAN, IN HER OFFICIAL CAPACITY AS DISTRICT ATTORNEY FOR THE COUNTY OF SAN DIEGO. Respondents.

CERTIFICATE OF COMPLIANCE

I certify under Rules 33.1(g) and (h) that Washington Legal Foundation's brief contains 4,024 words, excluding those portions of the brief exempted by Rule 33.1(d).

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Dated: September 29, 2023